

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 05-10004-PBS
)	
OLEKSIY SHARAPKA)	
Defendant.)	

GOVERNMENT'S ASSENTED-TO
MOTION TO CONTINUE RESTITUTION HEARING

Although the Court has already had a multi-day evidentiary sentencing hearing in this case, it has scheduled an additional hearing for March 23, 2007 to address the question of restitution, which could not be resolved during the sentencing hearing. The government, with the defendant's assent, asks the Court to continue this hearing to a date between April 26 and May 11, 2007. In support of this motion, the government states:

1. This hearing will be handled by AUSA Adam Bookbinder, who has replaced Seth Berman as the prosecutor on this case (Mr. Berman has left the office). AUSA Bookbinder will be out of the country on a long-scheduled family vacation on March 23.

2. Newly-appointed defense counsel has asked the government for additional documentation and/or reports supporting the government's proposed restitution amounts. The government is willing to produce this material, but doing so may take several weeks. And it will then take defense counsel some time to review the material the government produces.

The government, with the defendant's assent, therefore asks the Court to continue the

restitution hearing to a date between April 26 and May 11, 2007 – a period during which both counsel will be available.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Adam Bookbinder
ADAM J. BOOKBINDER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Adam J. Bookbinder
Adam J. Bookbinder

Dated: March 8, 2007